

UNITED STATES DISTRICT COURT

for the
Western District of Washington

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Feb 20, 2024	
CLERK U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA	
BY	DEPUTY

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)the eight Target Instagram Accounts more particularly
described in Attachment A

Case No. MJ24-5039

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A

located in the Northern District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

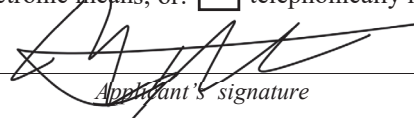
Offense Description

21 USC 841(a)(1), 846; 18 USC 924
(c), 1956Drug trafficking conspiracy, possession of firearms in furtherance of drug trafficking,
money laundering conspiracy

The application is based on these facts:

See Affidavit of DEA Special Agent Michael R. McDowell, continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☐ by reliable electronic means; or: ☐ telephonically recorded.


Michael R. McDowell, Special Agent

Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or
- ☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 02/20/2024



Judge's signature

City and state: Tacoma, Washington

David W. Christel, United States Magistrate Judge

Printed name and title

AFFIDAVIT

STATE OF WASHINGTON)
) ss
COUNTY OF PIERCE)

I, Michael R. McDowell, being first duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am employed as a Special Agent (SA) with the United States Drug Enforcement Administration (DEA) and have been so employed since September 2021. I am currently assigned to the Seattle Field Division. In this capacity, I investigate violations of the Controlled Substance Act, Title 21, United States Code, Section 801, et seq., and related offenses. I have received specialized training in the enforcement and investigation of the Controlled Substance Act. I have received over 620 hours of classroom training including, but not limited to, drug identification, drug interdiction, detection, money laundering techniques and schemes, smuggling, and the investigation of individuals and/or organizations involved in the illegal possession, possession for sale, sales, importation, smuggling, cultivation, manufacturing, and illicit trafficking of controlled substances.

2. In my role as a SA for the DEA, I have participated in controlled substance investigations which have resulted in the arrests of individuals, the seizures of illicit drugs and/or drug-related evidence, and the forfeiture of drug-related assets. I have been involved in the service of search warrants as part of these investigations. Because of my experience in serving these search warrants, I have become familiar with various tools, methods, trends, paraphernalia and related articles utilized by traffickers in their efforts to import, conceal, and distribute controlled substances. I am also familiar with methods of packaging, delivering, transferring, and laundering drug proceeds. Additionally, through

1 my training and experience, I can identify what are likely illegal drugs by sight, odor, and
2 texture.

3 3. I have participated in the debriefing of witnesses and informants. I have
4 also discussed with and learned from other law enforcement investigators about methods
5 of drug smuggling, distribution, packaging, trafficking, avoiding law enforcement, and
6 laundering proceeds, among other concerns related to drug trafficking.

7 4. In addition to practical experience, I have received formal training in
8 controlled substances enforcement. This includes training regarding controlled substance
9 recognition, field testing, undercover investigations, telecommunications analysis, and
10 surveillance techniques.

11 5. I have also been previously certified and employed as a Police Officer in
12 the city of Greenfield, Massachusetts. I was employed as a Police Officer from February
13 2015 through September 2021, during which time I conducted, or otherwise participated
14 in the investigation of over 400 felony offenses, and over 2,000 misdemeanor offenses. In
15 my capacity as a Police Officer, I received specialized training from the Massachusetts
16 Municipal Police Training Committee regarding drug interdiction, and detection
17 techniques. I have conducted, or otherwise participated in criminal investigations,
18 including, but not limited to Possession of Controlled Substances, Distribution of
19 Controlled Substances, Illegal possession of Firearms, financial and benefits-related
20 fraud, and pharmaceutical-related theft. I also completed the Drug Evaluation and
21 Classification program, administered by the National Highway and Traffic Safety
22 Administration, and was subsequently certified as a Drug Recognition Expert from 2018
23 to 2022.

24 6. I make this affidavit in support of an application for a search warrant for
25 information associated with the following eight Instagram accounts:

- 26 a. Account Identifier 23153502019, an Instagram account believed to be
27 used by Joel Adrian VALENCIA ROSAS (**Target Account 1**);

- b. Account Identifier 60082923383, an Instagram account believed to be used by Scott BURROWS (**Target Account 2**);
- c. Account Identifier 13801971207, an Instagram account believed to be used by Jesus Emmanuel CARDENAS GONZALEZ (**Target Account 3**);
- d. Account Identifier 26498653651, an Instagram account believed to be used by Silias HALE (**Target Account 4**);
- e. Account Identifier 1698269366, an Instagram Account believed to be used by Ronnie KENDRICK (**Target Account 5**);
- f. Account Identifier 2946923016, an Instagram Account believed to be used by Cristian MERCADO (**Target Account 6**);
- g. Account Identifier 5600171309, an Instagram Account believed to be used by Alyson PYLES (**Target Account 7**); and
- h. Account Identifier 61387315052, an Instagram account believed to be used by KeShaun TREMPER (**Target Account 8**),

collectively, the **Target Instagram Accounts**, that is stored at premises owned, maintained, controlled, or operated by Meta Platforms, Inc. (“Meta”), an electronic communications service and/or remote computing service provider headquartered at 1 Meta Way, Menlo Park, CA 94025.

7. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Meta to disclose to the government copies of the information (including the content of communications) further described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

8. The facts set forth in this affidavit are based on my own personal knowledge; knowledge obtained from other individuals during my participation in this

1 investigation, including other law enforcement officers; review of documents and records
2 related to this investigation; communications with others who have personal knowledge
3 of the events and circumstances described herein; and information gained through my
4 training and experience. Because this affidavit is submitted for the limited purpose of
5 establishing probable cause in support of the application for a search warrant, it does not
6 set forth every fact that I or others have learned during this investigation.

7 9. Based on my training and experience and the facts as set forth in this
8 affidavit, there is probable cause to believe that Joel Adrian VALENCIA ROSAS, Scott
9 BURROWS, Jesus Emmanuel CARDENAS GONZALES, Silias HALE, Ronnie
10 KENDRICK, Cristian MERCADO, Alyson PYLES, KeShaun TREMPER, and other
11 members of the VALENCIA ROSAS drug trafficking organization (DTO) have
12 committed, are committing, and will continue to commit violations of 21 U.S.C.
13 §§ 841(a)(1) and 846 (drug trafficking, conspiracy) and 18 U.S.C. § 1956 (money
14 laundering). A Grand Jury sitting in the Western District of Washington returned a
15 single-count drug trafficking indictment naming those eight individuals (and two others)
16 on November 29, 2023. A preservation request was sent to Meta for the **Target**
17 **Instagram Accounts** on December 5, 2023, and the users of the **Target Instagram**
18 **Accounts** were arrested by federal law enforcement on December 6, 2023.

19 10. This is the fifth application for a search warrant as it relates to **Target**
20 **Account 1**, the first application for a search warrant as it relates to **Target Account 2**,
21 and the second application for a search warrant as it relates to **Target Accounts 3, 4, 5, 6,**
22 **7, and 8**. Additionally, **Target Account 1** was the subject of a court order authorizing its
23 interception for the 30-day period between September 11 and October 10, 2023.

24 11. As described below, there is probable cause to believe that VALENCIA
25 ROSAS is the user of **Target Account 1**, that BURROWS is the user of **Target Account**
26 **2**, that CARDENAS GONZALEZ is the user of **Target Account 3**, that HALE is the
27 user of **Target Account 4**, that KENDRICK is the user of **Target Account 5**, that

MERCADO is the user of **Target Account 6**, that PYLES is the user of **Target Account 7**, and that TREMPER is the user of **Target Account 8**, and that each person used their respective account to commit drug trafficking crimes and related offenses. There is also probable cause to search the information described in Attachment A for evidence and instrumentalities of these crimes as further described in Attachment B.

THE INVESTIGATION

Overview

12. The United States, including the DEA, is conducting a criminal investigation of Joel Adrian VALENCIA ROSAS and others known and unknown regarding violations of 21 U.S.C. §§ 841(a)(1) and 846 (drug trafficking, conspiracy), 18 U.S.C. § 1956 (money laundering), and related offenses.

13. In May 2023, I applied for and received the first search warrant for the historical contents of VALENCIA ROSAS's Instagram account (**Target Account 1**). I received those materials on May 24, 2023, and, on or about June 15, 2023, ATF SA Brandon Willis also began reviewing the materials Meta provided. I submitted the second warrant on June 27, 2023 (and received the materials on July 25, 2023), submitted a third warrant on August 7, 2023 (and received the materials on August 24, 2023), and submitted a fourth warrant on September 7, 2023 (and received the materials on September 26, 2023).

14. On September 7, 2023, Chief District Judge David G. Estudillo signed an Order authorizing the interception of electronic communications to and from VALENCIA ROSAS's Instagram account. Investigators began receiving data from Meta (Instagram's parent company) on September 11, 2023, including messages VALENCIA ROSAS exchanged with some of the other **Target Instagram Accounts**. Interception ended on October 10, 2023. Because the authorized interception included only electronic communications and because investigators experienced technical challenges receiving data from Meta, the warrant I am requesting now, as it relates to **Target Account 1**,

1 reaches back to September 7, 2023, the last date on which investigators received
2 materials from Meta pursuant to a search warrant.

3 15. I last submitted a warrant for the contents of Scott BURROWS's Instagram
4 account on August 7, 2023. At that time, BURROWS's Instagram account was assigned
5 account number 3410917288. As described below, I believe BURROWS discontinued
6 use of that account in August 2023 and opened a new account (**Target Account 2**)
7 around that same timeframe. Thus, the warrant I am requesting now, as it relates to
8 **Target Account 2**, likewise reaches back to September 7, 2023.

9 16. ATF Special Agent Brandon Willis submitted a warrant for the contents of
10 CARDENAS GONZALEZ's Instagram account (**Target Account 3**) on September 12,
11 2023. Thus, the warrant I am requesting now, as it relates to **Target Account 3**, reaches
12 back to September 12, 2023.

13 17. On October 16, 2023, I submitted a warrant to Meta for the contents of
14 **Target Account 4** (HALE), **Target Account 5** (KENDRICK), **Target Account 6**
15 (MERCADO), **Target Account 7** (PYLES), and **Target Account 8** (TREMPER). Meta
16 initially responded on October 18, 2023. SA Willis and I began reviewing those materials
17 the same day. Meta later provided additional materials on December 15, 2023, which
18 they said had been omitted from their October 18, 2023, production. SA Willis and I
19 continued our review of these new materials. The data produced by Meta from these five
20 accounts covered a period between July 1 and October 13, 2023. Thus, the warrant I am
21 requesting now, as it relates to **Target Accounts 4, 5, 6, 7, and 8**, reaches back to
22 October 13, 2023.

23 18. Examples of communications found in the materials returned pursuant to
24 one of the respective search warrants and/or an example obtained through the interception
25 of VALENCIA ROSAS's Instagram account (**Target Account 1**) is included to provide a
26 representative example of each account user's involvement in the DTO. Unless
27

specifically noted, the examples below were found in the materials returned pursuant to prior search warrants.

Target Account 1 (VALENCIA ROSAS)

19. In April 2023 investigators debriefed a Confidential Source (CS3) regarding VALENCIA ROSAS's drug trafficking activities.¹ CS3 advised investigators that VALENCIA ROSAS had an active Instagram profile under the username "mr.money_rose." CS3 allowed me to examine VALENCIA ROSAS's Instagram story post (using CS3's phone) that was live at the time. Within the story postings, I saw VALENCIA ROSAS and three associates (one of whom was BURROWS) at a vacant HomeGoods storefront in Everett, WA. This corroborated GPS tracking data associated with VALENCIA ROSAS's phone numbers and a vehicle he was using at the time, which indicated that VALENCIA ROSAS was in Everett, WA near the Everett Mall. CS3 also told investigators that VALENCIA ROSAS routinely changed the display name (username) on his Instagram account.

20. Information provided from the first search warrant I obtained for VALENCIA ROSAS's Instagram account confirmed that the account, regardless of the display name (username), was assigned user identification number 23153502019 (**Target Account 1**).

21. As noted above, investigators intercepted electronic communications over **Target Account 1** from September 11 to October 10, 2023. One of the first series of intercepted communications relevant to the investigation occurred on September 11, between VALENCIA ROSAS (**Target Account 1**) and Alyson PYLES (**Target Account**

¹ Confidential Source 3 ("CS3") is an official CS signed with the Lakewood Police Department. CS3 has no criminal history and no history of being untruthful with law enforcement. CS3 is an unpaid source who is working for legal considerations in the future. CS3 has specific knowledge of Joel Adrian Valencia Rosas and his use of **Target Account 1**; before signing up as a DEA Task Force confidential source, CS3 purchased cocaine from Valencia Rosas and members of the Valencia Rosas DTO in 2022 and 2023, and subsequently distributed it. Investigators believe CS3's information to be credible and reliable, within the context of the information detailed and relied upon for purposes of this application.

7). PYLES told VALENCIA ROSAS she was “waiting for ur boy to get off work so I can get my pack.” As the conversation continued, PYLES and VALENCIA ROSAS coordinated a meeting at the “Alta apartments.” In the meantime, VALENCIA ROSAS was also communicating with Rodrigo Rodriguez Rosas (Instagram account number 268789775). VALENCIA ROSAS told Rodriguez Rosas, “In 15 minutes in front of the office. Gray Chrysler 300, she is a white girl, her name is Aly. She wants a corner, 9 zips” and then, “She is there waiting for you.”

22. Based on my training and experience I know that “zips” is a code word to describe ounce quantities of controlled substances. I also know that a “corner” is a reference to the corner of a kilogram-sized brick of cocaine. Based on the context of this conversation I believe Alyson PYLES, a white female, was acquiring 9oz of cocaine outside the office of the Alta Apartments. PYLES’s primary motor vehicle at the time was a gray 2013 Chrysler 300. I believe this is one example of VALENCIA ROSAS’s use of **Target Account 1** for drug trafficking purposes. Other examples appear throughout this affidavit.

Target Account 2 (BURROWS)

23. Investigators identified Scott BURROWS as a member of the VALENCIA ROSAS DTO through information provided by confidential sources, physical surveillance observations, telephone toll analysis, and social media postings. As noted above, when investigators met with CS3 in April 2023 and reviewed VALENCIA ROSAS’s Instagram account, I saw BURROWS in a video posted to VALENCIA ROSAS’s account. From there, I was able to identify an account associated with BURROWS and saw many videos and postings indicative of his involvement in drug trafficking. At that time, BURROWS’s account had a different identification number assigned to it. I discovered BURROWS’s new account number (60082923383, **Target Account 2**) both from review of materials returned from the September search warrant on VALENCIA ROSAS’s Instagram account (**Target Account 1**) and during the

1 interception of **Target Account 1**. It appeared BURROWS had opened this new
 2 Instagram account in August 2023.

3 24. On October 11, 2023, I received information from Source of Information 2
 4 (SOI 2) about VALENCIA ROSAS and BURROWS.² SOI 2 advised me that
 5 BURROWS had been posting on his Instagram account (then displaying username
 6 “bandka253”) the sale of kilogram quantities of cut cocaine (“re”) for \$8,000, and the
 7 sale of fentanyl pills for \$.45 (for the starting quantity of 1,000 pills). SOI 2 stated that
 8 this price would decrease with the increase in purchase quantity. SOI 2 advised that the
 9 VALENCIA ROSAS DTO was actively selling kilograms of uncut cocaine (“raw”) for
 10 \$28,000 to \$32,000. This was a significant increase to the typical price investigators saw
 11 during the investigation, when VALENCIA ROSAS and BURROWS posted sale prices
 12 of \$15,500 for kilograms of uncut cocaine (“raw”).

13 25. On October 24, 2023, SOI 2 provided me with a photo of an Instagram
 14 story post by “Gotmotion253.” SOI 2 advised me that this account was used by Scott
 15 BURROWS. BURROWS posted a backdrop with snowflakes falling and had added the
 16 caption “[snowflake emoji] 35” followed by a red “O.” SOI 2 advised me that
 17 BURROWS was advertising the sale of kilogram quantities of cocaine for \$35,000. SOI 2
 18 stated that the red “O” indicated the “zone,” or quantity. According to SOI 2, the “O”
 19 signified “whole packs” or kilogram quantities of cocaine. SOI 2 indicated that this was a
 20
 21

22 ² SOI 2 met with investigators once in 2023 to discuss information pertaining to the VALENCIA ROSAS DTO and
 23 provided investigators with additional information after that meeting. SOI 2 was a former distributor for the
 24 VALENCIA ROSAS DTO and has direct knowledge of the DTO’s operations. During the meeting with
 25 investigators, SOI 2 showed investigators SOI 2’s Instagram communication records verifying contact with the
 26 DTO, then showed me what SOI 2 believed to be VALENCIA ROSAS’s Instagram page, which I recognized based
 27 on the photos that were viewable on the page. SOI 2 has pending criminal charges in an unrelated drug trafficking
 investigation, and a pending marijuana possession charge in another state. SOI 2 voluntarily provided information
 on the VALENCIA ROSAS DTO to obtain consideration in SOI 2’s pending matter. Investigators believe SOI 2’s
 information to be credible and reliable, within the context of the information detailed and relied upon for purposes of
 this application.

1 common term used by the VALENCIA ROSAS DTO when talking about controlled
2 substances.

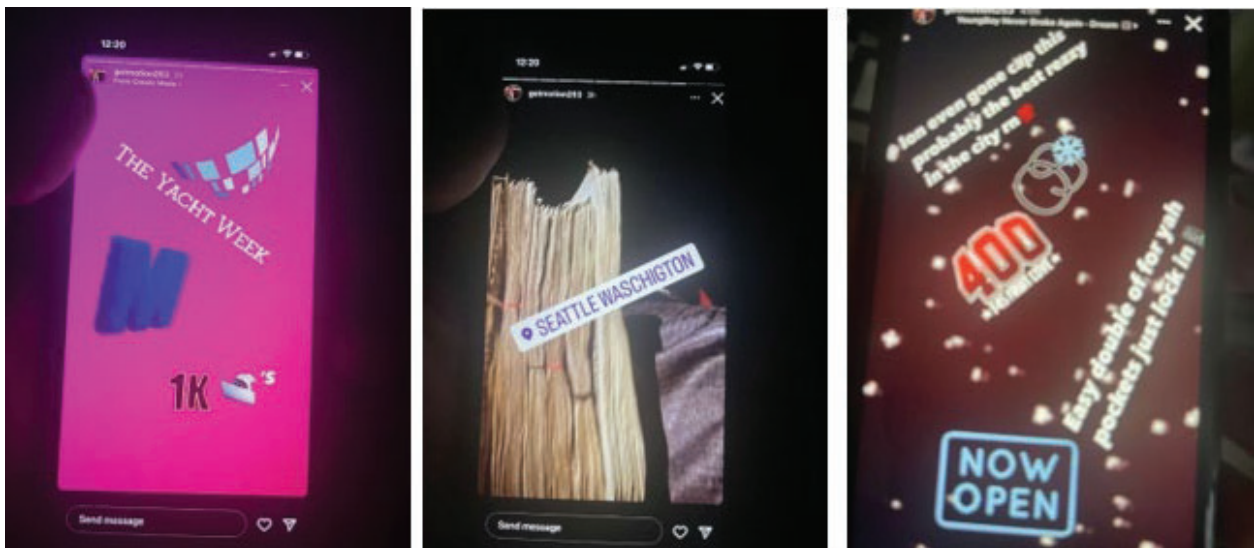
3 26. SOI 2 stated that since the VALENCIA ROSAS DTO had recently lost a
4 substantial load of controlled substances in September, the VALENCIA ROSAS DTO
5 was selling “raw” or uncut controlled substances they had at a large markup price
6 compared to what their selling prices were prior to the loss. SOI 2 stated that the regular,
7 frequent customers of the VALENCIA ROSAS DTO would likely continue buying
8 controlled substances from the VALENCIA ROSAS DTO despite this price increase
9 because they were established, “regular” customers who would increase their re-sale
10 prices to counter the increase in purchase price.

11 27. In early November 2023, SOI 2 advised me that BURROWS was
12 advertising the sale of kilogram quantities of pure cocaine for \$18,000, kilogram
13 quantities of cocaine cut with diluents for \$8,000, ounce quantities of cocaine for \$350,
14 and fentanyl pills for \$.70 per pill. SOI 2 referenced BURROWS’s Instagram story posts
15 on an account now displaying the username “Gotmotion253.” I reviewed **Target**
16 **Account 2**, which was then public, on November 6, 2023, and saw the same story
17 postings, indicating that BURROWS had posted them within the previous 24 hours.

18 28. SOI 2 contacted me again on December 5, 2023, to advise that BURROWS
19 had yet again posted drug sale advertisements on **Target Account 2**. In the first image
20 SOI 2 advised me of (on the left, below), BURROWS posted “The Yacht Week” with a
21 blue “M” and “1K (boat emoji)”. Based on my training and experience I know that
22 “yacht” is a slang term used by drug traffickers for 10,000 fentanyl pills, and that
23 “yachts” were a common sale description and quantity for drug traffickers. I also know
24 that the boat emoji is synonymous with the slang term “boat,” which is used in the drug
25 trade to describe quantities of 1,000 fentanyl pills. I also know that the blue “M” is
26 synonymous with counterfeit M30 pills, which are blue and contain various amounts of
27

1 fentanyl. I believe, based on my training and experience that BURROWS was advertising
2 the sale of quantities of 1,000 and 10,000 fentanyl pills, starting at \$1,000 for 1,000 pills.

3 29. In the second photo (center, below), BURROWS appeared to be holding a
4 large amount of banded U.S. currency in his lap, consistent with drug sale proceeds, with
5 the caption “Seattle Waschigton [sic].” In the third image (on the right), BURROWS
6 advertised the sale of “the best rezzzy in the city [right now].” I know “rezzzy” is slang for
7 cocaine mixed with diluents to increase its volume at the cost of diminishing its potency.
8 Also, BURROWS used the snowflake emoji, which I know is synonymous with cocaine
9 in this context.



19 30. When agents arrested BURROWS on December 6, 2023, he had two
20 cellphones in his possession. In the apartment (to which he had recently relocated, after
21 moving out of a DTO residence in Spanaway), agents found an unknown quantity of
22 suspected fentanyl pills (164.5 gross grams) and suspected cocaine (72.8 gross grams). At
23 the DTO residence in Spanaway, agents found suspected cocaine (443.1 gross grams).

24 31. Based on the above, I believe BURROWS used **Target Account 2** in
25 furtherance of drug trafficking activities for the VALENCIA ROSAS DTO.
26
27

Target Account 3 (CARDENAS GONZALEZ)

32. Investigators identified Jesus Emmanuel CARDENAS GONZALEZ as a transporter for the VALENCIA ROSAS DTO who had traveled interstate in furtherance of drug trafficking activities, most notably in June 2023. That month, he traveled with DTO members from Western Washington to Arizona; on the return trip, agents stopped the vehicle CARDENAS GONZALEZ was driving and found approximately 200,000 fentanyl pills in hidden compartments.

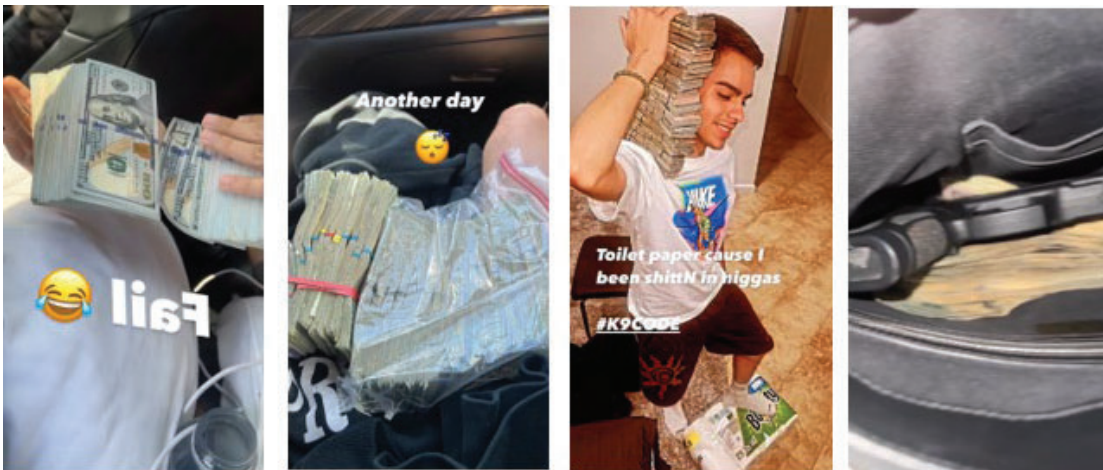
33. The profile associated with CARDENAS GONZALEZ's account (**Target Account 3**) appeared in search warrant returns from VALENCIA ROSAS's account (**Target Account 1**). Investigators identified CARDENAS GONZALEZ as the user of **Target Account 3** through examination of the profile picture associated with that account, which I recognized as CARDENAS GONZALEZ from surveillance photos and his California driver's license photo. **Target Account 3** also had the profile name "Manny Cardenas." During this investigation, I have learned that CARDENAS GONZALEZ was referred to by several different names, including "Manny," short for his middle name.

34. As noted above, investigators submitted a warrant for the contents of **Target Account 3** to Meta in September 2023. Through examination of the returned data I saw that CARDENAS GONZALEZ frequently used his social media account to show off his earnings and exposure to the financial benefits of drug trafficking. For example, on May 11, 2023, CARDENAS GONZALEZ posted a video on **Target Account 3** of himself spreading a large stack of U.S. currency down his forearm, and then allowing a large amount to fall. He captioned the video "Fail." A screenshot from that video appears below on the far left (with the caption reversed). I captured this image by pausing the video and using computer software to capture the freeze-frame of the video, during which process the caption was reversed. The next day, May 12, 2023, CARDENAS GONZALEZ posted a video to the Instagram story on **Target Account 3** showing large

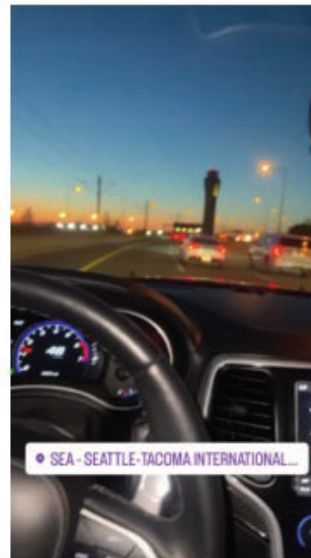
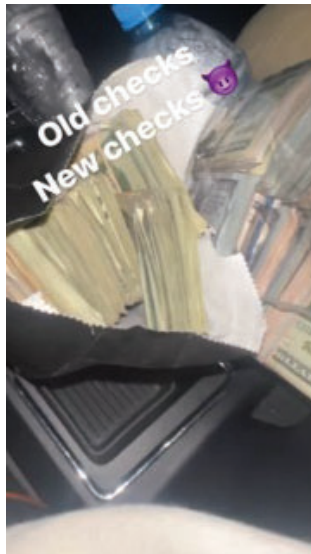
amounts of banded U.S. currency on his lap with the caption “Another day,” suggesting this was different currency than he had posted the day before. A screenshot from that video appears below, second from the left.

35. On May 16, 2023, CARDENAS GONZALEZ posted a photo to **Target Account 3** of himself holding a large amount of banded U.S. currency on his shoulder while inside a residence. Based on my training and experience, this amount of currency is consistent with drug trafficking proceeds. He captioned the photo, in part, with #K9CODE.” Based on my experience investigating the VALENCIA ROSAS DTO I know that “K9CODE” is the term VALENCIA ROSAS and others used to specify the DTO’s postings to their social media followers. This photo appears below and is the third from the left.

36. Finally, on May 20, 2023, CARDENAS GONZALEZ posted a video to **Target Account 3** showing what appears to be the contents of a shoulder satchel investigators knew him to wear. Inside the satchel was a large amount of U.S. currency and a handgun. Based on my training and experience I know that it is common for drug traffickers to carry firearms as they transport controlled substances and large amounts of money, to protect themselves and the contraband and/or currency they are carrying. A screenshot from that video appears below, on the far right.



37. On June 5, 2023, CARDENAS GONZALEZ posted a video to his Instagram story captioned “Old checks New checks” with the purple devil face emoji. He panned the video from an unknown check written for \$405.37 across to large sums of banded U.S. currency wrapped in plastic and elastic bands. It appeared he was illustrating the contrast with what he had previously been earning versus what he was earning working for the VALENCIA ROSAS DTO (left image). Later that night, around 10:40PM, CARDENAS GONZALEZ posted a video to his Instagram story driving in a car with the SeaTac International Airport tower in the background, indicating that he was likely traveling for the VALENCIA ROSAS DTO (right image).



38. Based on the above, I believe CARDENAS GONZALEZ used **Target Account 3** in furtherance of drug trafficking activities for the VALENCIA ROSAS DTO.

Target Account 4 (Sillas HALE)

39. Investigators identified HALE as being involved in the VALENCIA ROSAS DTO after he crossed the U.S./Mexico border with VALENCIA ROSAS on March 27, 2023, according to information provided by CBP. During agents' examination of the search warrant returns from **Target Account 1** (VALENCIA ROSAS), they saw conversations with the user of **Target Account 4** that appeared consistent with an

1 individual working for VALENCIA ROSAS as a drug trafficker. Agents identified
2 HALE as the user of **Target Account 4** after comparing photos from the Instagram
3 profile on that account to HALE's driver's license photo. I found the following
4 communications supporting my belief HALE used **Target Account 4** for drug trafficking
5 purposes.

6 40. Starting around 7:30PM on July 1, 2023, the unidentified user of Instagram
7 account "Alivia_1555" (account number 6918643868) exchanged a series of drug-related
8 messages with HALE (**Target Account 4**) via Instagram Messenger which started off
9 with Alivia_1555 asking HALE, "Yo can I get a half gram." HALE responded in the
10 affirmative and the two messaged about where to meet, with HALE saying the "same
11 spot," and Alivia_1555 indicating (repeatedly) she was on the way. The messages ended
12 when Alivia_1555 said "here." About a day and a half later, just after midnight on July 3,
13 2023, Alivia_1555 contacted HALE (**Target Account 4**) again, asking "Can I get a half
14 again." She also indicated she could come "right now," but HALE did not respond.

15 41. On August 11, 2023, HALE (**Target Account 4**) contacted Alivia_1555 via
16 Instagram Messenger to inquire about a potential drug sale meeting, asking "who need
17 snow," "I'm mobile," and "[you know] anyone looking for snow." I know, based on
18 training and experience, that "snow" is a coded reference to cocaine. Alivia_1555
19 responded, "I'll [let you know] if I can find anyone who wants."

20 42. Five days later, on August 16, 2023, HALE (**Target Account 4**) contacted
21 the unidentified user of Instagram account "lightsoutgeezy" (account number
22 2014606771) and asked, "[You know] who be fuckin with powder." I know, based on
23 training and experience, that "powder" is a slang term for cocaine. Lightsoutgeezy
24 responded that he knew a "few people," and HALE asked who needed it. Lightsoutgeezy
25 responded, "Lemme ask if anyone need [right now] my cuzzo usally pick up balls."
26 "Balls" is an abbreviated term for "8-ball," which is a slang term used to describe one-
27

1 eighth-ounce quantities of cocaine. In this conversation, I believe HALE was asking
2 lightsoutgeezy if s/he knew anyone who was hoping to buy cocaine.

3 43. During the interception of VALENCIA ROSAS's Instagram account
4 (**Target Account 1**), at 8:10PM on September 18, 2023, VALENCIA ROSAS was
5 communicating with the unidentified user of Instagram account name "Four2filthy,"
6 (account number 28140962262) about conducting a transaction for "5" at 1201 S 336th
7 St, Building P, Federal Way, WA. Four2filthy agreed to pay the price of "2" and would
8 repay for the remaining "3" later. In session #3031, Four2Filthy stated. "Give me another
9 2." In session #3034, VALENCIA ROSAS asked, "Re or raw bros." In session #3035,
10 Four2filthy responded, "Re." Based on my training and experience I believe that "re"
11 means controlled substances that have been cut with diluents to increase the quantity of
12 the substance while sacrificing purity and quality of the substance. I believe that "raw"
13 means uncut controlled substances that would be considered pure in quality, therefore
14 valued more and priced higher.

15 44. As the conversation continued, VALENCIA ROSAS provided the address
16 for the transaction as "1201 S 336th St, Federal Way, WA 98003 United States." He then
17 stated in session #2891, "My runner has some right there." That S336th St address is
18 where HALE was living at the time. VALENCIA ROSAS was also communicating with
19 HALE (**Target Account 4**) during this period and directed HALE to sell "5" to the user
20 of Instagram account "Four2filthy." Investigators established surveillance around 1201 S
21 336th St, Building P, Federal Way, WA. At 8:30PM in session #3005, Four2filthy
22 advised VALENCIA ROSAS, "I'm here bros." At approximately that time, Det. Jordan
23 Goss saw a grey Toyota Highlander arrive in the parking lot and park in front of building
24 P. In session #3003, VALENCIA ROSAS advised HALE (**Target Account 4**), "He's
25 outside." HALE (**Target Account 4**) acknowledged. VALENCIA ROSAS then advised
26 HALE (**Target Account 4**), "Silver Toyota," in session #3009. At approximately
27

1 8:37PM, Det. Goss saw HALE exit Building P and enter the front passenger seat of the
2 Highlander parked in front of the building.

3 45. About a minute later, HALE exited the vehicle and returned to Building P.
4 At approximately 8:42PM, the Highlander left. In session #3020 VALENCIA ROSAS
5 asked HALE (**Target Account 4**), "Do you see him." In session #3021, HALE (**Target**
6 **Account 4**) responded, "Yeah it's done." Investigators believe that HALE entered
7 Four2filthy's vehicle and provided Four2filthy with the agreed upon quantity of
8 controlled substances.

9 46. The next day, September 19, 2023, investigators intercepted Instagram
10 communications between HALE (**Target Account 4**) and VALENCIA ROSAS
11 regarding the transfer of money from HALE to VALENCIA ROSAS in exchange for a
12 suspected resupply of controlled substances.

13 47. Based on the information described above, I believe HALE used **Target**
14 **Account 4** for drug-related purposes. HALE was released from custody on a pretrial
15 appearance bond in early January 2024, and it is possible he has resumed use of **Target**
16 **Account 4**.

17 ***Target Account 5 (Ronnie KENDRICK)***

18 48. Investigators identified KENDRICK as a drug trafficker working with the
19 VALENCIA ROSAS DTO through confidential source information, physical and
20 electronic surveillance, and review of social media accounts. Investigators first suspected
21 the user of **Target Account 5** was associated with drug trafficking activities after
22 reviewing historical search warrant data from **Target Account 1** (VALENCIA ROSAS)
23 and reading numerous conversations that were consistent with drug trafficking
24 communications. Agents identified KENDRICK as the user of **Target Account 5** after
25 comparing the profile picture from the Instagram account to KENDRICK's driver's
26 license photo.
27

49. During the interception of VALENCIA ROSAS's account (**Target Account 1**), investigators intercepted a series of communications between VALENCIA ROSAS and KENDRICK on October 8, 2023, in which KENDRICK (**Target Account 5**) said, "Need 2 whole ones." After KENDRICK confirmed he would be at home, VALENCIA ROSAS said, "Ok so k can get dropped off and chop it up." Based on the context of this conversation I believe that KENDRICK was asking for two ounces of cocaine ("two whole ones") from VALENCIA ROSAS. I further believe that VALENCIA ROSAS needed to break apart a larger quantity of cocaine, which is typically in a compressed brick shape, to get the two ounces ("chop it up").

50. In addition to conversations KENDRICK (**Target Account 5**) had over Instagram with VALENCIA ROSAS regarding drug trafficking, I also observed KENDRICK engaging with others via Instagram messenger regarding drug trafficking, and therefore believe that KENDRICK uses **Target Account 5** in furtherance of drug trafficking activities.

51. For example, on July 15, 2023, the unidentified user of Instagram account name "2toneclank" (account number 55101170) and KENDRICK (**Target Account 5**) exchanged the following series of communications via Instagram Messenger:

2toneclank – Broo

KENDRICK – Wassup G

2toneclank – You know where some perc 10s is out here my boy?

KENDRICK – I got rp 20s

2toneclank – Bet lmk if you run cross sum 10s or 5s

KENDRICK – I got some 5s for 8\$ and 10s for 15

KENDRICK – Pink ones

2toneclank – Bet what's yo number?

52. Based on the context of this conversation I believe that 2toneclank was looking for 10mg or 5mg Percocet pills and KENDRICK advised he had both dosages

1 available for purchase at \$8.00 (5mg) and \$15.00 (10mg) each. Percocet is a prescription-
2 only controlled substance, and KENDRICK does not have legal authorization to write
3 prescriptions or dispense controlled substances.

4 53. The following month, on August 27, 2023, the user of Instagram account
5 name “moneyteam.von (account number 51794586439) contacted KENDRICK (**Target**
6 **Account 5**), writing, “65 cents tapN wit me brudda send me sum plays” and “50-65*.”
7 KENDRICK did not immediately respond. Based on my training and experience,
8 moneyteam.von was asking KENDRICK to purchase fentanyl pills at \$.50 to \$.65 cents
9 per pill.

10 54. The account number assigned to Instagram account “moneyteam.von,”
11 51794586439, is the same account number that was assigned to a profile under the name
12 “bouta.bag00.” I identified “bouta.bag00” as an account of interest during my review of
13 historical Instagram search warrant data from **Target Account 1** (VALENCIA ROSAS).
14 On November 5, 2022, VALENCIA ROSAS asked the user of “bouta.bag00” to provide
15 his full name as it appeared on his state identification card so that VALENCIA ROSAS
16 could purchase an airline ticket for him. “Bouta.bag00” sent the name Evon Earnest
17 JACKSON and JACKSON’s known date of birth to VALENCIA ROSAS via Instagram
18 Messenger, and VALENCIA ROSAS sent a message back confirming the spelling and
19 date of birth. For these reasons, I believe JACKSON used “bouta.bag00,” and given the
20 similarity in the assigned account number, that JACKSON also used the profile name
21 “moneyteam.von.” JACKSON is an indicted co-conspirator in the VALENCIA ROSAS
22 DTO.

23 55. On September 8, 2023, HALE (using a different Instagram account than
24 Target Account 4) contacted TREMPER (**Target Account 5**) via Instagram Messenger to
25 ask, “you still have them 15?” KENDRICK responded that he did, and HALE indicated
26 he needed them and wanted to meet KENDRICK. HALE and KENDRICK (**Target**
27 **Account 5**) then engaged in a 60-second audio call. Based on my training and experience

1 I know that drug traffickers commonly use coded and/or vague language when
2 communicating electronically to thwart law enforcement efforts by making their
3 conversations more difficult to understand. Drug traffickers believe this mitigates risk
4 when conducting illegal activity. I believe this short audio conversation preceded by
5 HALE asking for “15” is consistent with a drug trafficking conversation between
6 KENDRICK and HALE.

7 56. Based on the information described above, I believe KENDRICK used
8 **Target Account 5** for drug-related purposes.

9 ***Target Account 6 (Cristian MERCADO)***

10 57. Investigators identified MERCADO as being involved in the VALENCIA
11 ROSAS DTO after MERCADO crossed the border from Mexico into the United States
12 with VALENCIA ROSAS on November 3, 2022, in the vehicle investigators later seized
13 200,000 fentanyl pills from in June 2023. MERCADO was among the DTO members
14 indicted by the Grand Jury on November 29, 2023, and arrested on December 6, 2023.

15 58. I identified MERCADO as the user of **Target Account 6** after evaluating
16 prior search warrant returns from VALENCIA ROSAS’s Instagram account. In those
17 returns I saw regular communications between VALENCIA ROSAS and the user of
18 **Target Account 6**. I looked up **Target Account 6** on Instagram and immediately
19 recognized the depicted user as MERCADO based on my previous observations of his
20 Washington driver’s license as well as photos and videos VALENCIA ROSAS had
21 posted on his Instagram story in which MERCADO was included.

22 59. One example of MERCADO’s use of **Target Account 6** for drug
23 trafficking purposes occurred on June 30, 2023, when MERCADO initiated a
24 conversation with the unidentified user of Instagram account “jeanbee111” (account
25 number 194220274), sending video files for various marijuana strands he was selling.
26 MERCADO stated, “White truffle \$1150,” “Gelato 41 \$1150,” and “Nightmare gelato
27 \$850.” Based on my training and experience I know that these are the names of different

1 strands of marijuana, and that these prices are for pound-quantities of marijuana. On July
2 10, 2023, jeanbee111 responded to MERCADO stating, "You got more shit in?" "Just
3 [let me know]." MERCADO responded, "Was busy earlier this week," "I'm free today,"
4 "Got hella flavors." Jeanbee111 responded, "Yup can we link I need that." The two
5 arranged to meet at Buffalo Wild Wings at the Southcenter Mall in Tukwila, WA on July
6 12, 2023.

7 60. In a series of intercepted communications over VALENCIA ROSAS's
8 Instagram account on September 20, 2023, MERCADO (**Target Account 6**) talked about
9 purchasing fentanyl from VALENCIA ROSAS. At 1:08PM MERCADO initiated the
10 conversation, telling VALENCIA ROSAS "I need." When VALENCIA ROSAS asked,
11 "how many," MERCADO responded, "5k I think" and "how many left." VALENCIA
12 ROSAS said he had "200" "K" and they were "flying at that price." MERCADO said he
13 would "grab some today."

14 61. Based on the context of this conversation and my knowledge of this
15 investigation, I believe that MERCADO (**Target Account 6**) was attempting to purchase
16 ("I need") 5,000 fentanyl pills ("5k") from VALENCIA ROSAS, and that VALENCIA
17 ROSAS had 200,000 pills left at that time ("I have 200" "K"). Investigators were
18 conducting physical surveillance on VALENCIA ROSAS on this date but did not observe
19 VALENCIA ROSAS meet with MERCADO during their surveillance efforts, which
20 terminated at 7:29PM when investigators lost sight of VALENCIA ROSAS and could not
21 relocate him.

22 62. In the late evening of September 28, 2023, JACKSON exchanged messages
23 with MERCADO via Instagram messenger regarding drug-related activity. JACKSON
24 stated "Way gang" followed by "Bro [I don't know] why you don't [fuck with me] but
25 even then I'll throw you the bread for those pS." MERCADO responded the next
26 afternoon stating, "Shit just waking up went to bed dummy late. Bro I never didn't fuck
27 with you just wanted to get paid back before you grab anything else I front you again.

1 And yeah bro it wasn't even anything crazy like a band for 2 ps or some." JACKSON
2 responded stating, "Bro I've had that bread for you 1000 times since then bro [I don't
3 know] what [people] been tellin you but I'm bout my bread bro ... [I don't know] what
4 made you think I wasn't payin you but I literally hit you acouple days later tellin you I
5 had the nread [sic]."

6 63. Based on my training and experience I know that "bread" is a slang term
7 for money, and "ps" is a slang term for "pounds" of controlled substances. I also know
8 that to "front" is to give drugs to a customer in advance of payment later. Based on the
9 context of this conversation I believe that MERCADO was advising JACKSON that he
10 (MERCADO) would not supply JACKSON with more controlled substances until
11 JACKSON had paid in full his debts to MERCADO.

12 64. MERCADO's conversation with JACKSON continued on October 4, 2023,
13 when JACKSON reported he "just got rid of my last yatch [sic] I'm finna reup soon."
14 MERCADO responded, "In the town smokin drivin" and "Bet [let me know] sum I been
15 lookin for em." Based on my training and experience I know that "yacht" is a slang term
16 used by drug traffickers to describe 10,000 fentanyl pills. Based on the context of this
17 conversation I believe MERCADO had been looking to acquire a large quantity of
18 fentanyl pills for redistribution ("I been lookin for em") but JACKSON did not have any
19 at the time.

20 65. Based on this information I believe that MERCADO used **Target Account**
21 **6** in furtherance of drug trafficking activities.

22 ***Target Account 7 (Alyson PYLES)***

23 66. Investigators identified Alyson PYLES as being involved in the
24 VALENCIA ROSAS DTO in late July 2023 after seeing her at VALENCIA ROSAS's
25 Spanaway residence. On July 27, 2023, VALENCIA ROSAS returned from what
26 investigators believe to be a drug resupply trip to the Los Angeles area in a Chrysler 300
27 registered to PYLES. During examination of historical search warrant data from **Target**

1 **Account 1**, investigators saw that the user of **Target Account 7** had sent a photo of a
2 Dorito's bag with blue M30 pills and a reference to Phoenix captioned on it. Investigators
3 knew VALENCIA ROSAS had been acquiring his supply of fentanyl pills from Phoenix,
4 AZ, and therefore noted this communication as suspicious and worked to identify the user
5 of **Target Account 7**. Agents identified PYLES as the user of **Target Account 7** after
6 comparing photos from the profile page on that account to PYLES's driver's license
7 photo and photos from physical surveillance on July 27, 2023.

8 67. As noted above, when agents began the interception of VALENCIA
9 ROSAS's Instagram account (**Target Account 1**) on September 11, 2023, one of the first
10 series of communications was between PYLES (**Target Account 7**) and VALENCIA
11 ROSAS, related to PYLES's desire to pick up 9 ounces of cocaine.

12 68. From our review of the contents of PYLES's account obtained through a
13 prior search warrant, investigators found other communications showing PYLES's use of
14 **Target Account 7** for drug trafficking purposes. For example, on July 21, 2023, the
15 unidentified user of the Instagram account "gualastench" (account number 1719879377)
16 messaged PYLES via Instagram Messenger asking her, "Who got raw." Based on my
17 training and experience I know that "raw" is a slang term for uncut cocaine. PYLES
18 responded stating, "They [on the way] back w it [right now]," "Couple days n I gotchu,"
19 "[I know] I been out w that all together for like a wk n a half," "But when I'm on I'll hit
20 u." I believe PYLES was telling this customer that her source of supply (the VALENCIA
21 ROSAS DTO) was bringing cocaine to the area and PYLES would be able to fill the
22 order in a few days.

23 69. On August 10, 2023, PYLES sent a message to the unidentified user of
24 Instagram account "mrcut_emoff775" (account number 46709459432). In this message,
25 PYLES stated, "Snow back in [hit me up]." Based on my training and experience I know
26 that "snow" is a common slang term to describe cocaine. This date correlates with a trip
27 VALENCIA ROSAS, HALE, and KeShaun TREMPER took to Tijuana, MX and Los

1 Angeles, CA. The vehicle TREMPER drove across the border during the trip was the
2 same vehicle that investigators seized in late September 2023 and discovered two
3 concealed compartments inside containing 37 individually wrapped kilogram-sized
4 packages containing cocaine, and one package containing approximately 10,000 fentanyl
5 M30 pills.

6 70. On September 10, 2023, the unidentified user of Instagram account name
7 “newfliphone” (account number 1588345371) advised PYLES that, “My plug might be
8 tryna shop w you” and asked “How much u do zips for.” Based on my training and
9 experience I know that “plug” is a slang term used to describe a drug dealer or drug
10 source of supply and “zips” is a slang term used to describe ounce-quantities of
11 controlled substances. PYLES responded stating, “Depends how many u grab etc I’m
12 flexible w it.” She then asked, “What’s he paying now?” Newfliphone stated “625.”
13 PYLES stated, “I’ll beat it at 6” and “He’s gotta be consistent.” Newfliphone stated,
14 “Yup it’s good I’ll hit him [right now] and try to tap ysl [sic] in.” Based on the context of
15 this conversation I believe that PYLES was working with Newfliphone to acquire the
16 Newfliphone’s source of supply as a VALENCIA ROSAS DTO distributor by selling
17 cocaine at a lower price than the competition.

18 71. On October 9, 2023, PYLES posted two photos showing herself holding a
19 large amount of U.S. currency in banded form, then again spread out in a fan in her hand.
20 The caption of the photo was “Pray4MyEnemies,” and the photo had an in-photo caption
21 of “Y’all weird as fuck.” She then followed that photo with another of herself holding a
22 spread of various denominations of U.S. currency, ranging from \$100 dollar bills to \$20
23 dollar bills. Based on my training and experience, I know that it is a common for drug
24 traffickers to store large quantities of currency in banded stacks, and it is also common
25 for individuals to flash large amounts of cash on social media to display their status as
26 high-earning drug traffickers.
27

72. Based on this information I believe that PYLES used **Target Account 7** in furtherance of drug trafficking activities. PYLES was released from custody on a pretrial appearance bond in February 2024, and it is possible she has resumed use of **Target Account 7**.

Target Account 8 (KeShaun TREMPER)

73. Investigators identified TREMPER as being involved in the VALENCIA ROSAS DTO on March 8, 2023, when TREMPER was traveling with VALENCIA ROSAS DTO members to Youngstown, OH. From materials returned via search warrant for VALENCIA ROSAS's account (**Target Account 1**), agents then identified TREMPER as the user of a prior Instagram account through comparison of photos and videos posted to that account with photos taken during physical surveillance. From additional search warrant materials, investigators believe TREMPER stopped using that prior account around May 3, 2023, and began using **Target Account 8** around August 27, 2023.

74. From the materials returned pursuant to search warrants, I saw that on March 18, 2023, TREMPER (using his prior account) and VALENCIA ROSAS (**Target Account 1**) had the following conversation:

VALENCIA-ROSAS: Tell yo Dad he can get snow bunnies for 650 a pop

VALENCIA-ROSAS: And whole thangs in Tacoma for 18

TREMPER: Bett just did he thinks he just got some better shit imma have to bring some over to him [let me know] when we can link

75. Based on my training and experience, VALENCIA ROSAS was discussing prices for various quantities of cocaine ("snow bunnies"), with "whole thangs" likely being a kilogram of cocaine for the price of \$18,000. TREMPER acknowledged and said he needed to bring over a sample of VALENCIA ROSAS's product to his father.

76. On August 27, 2023, TREMPER (**Target Account 8**) posted a photo from the perspective of someone seated in the driver's seat of a Mercedes holding a large, banded stack of U.S. currency on his lap.

77. On September 6, 2023, TREMPER (**Target Account 8**) and VALENCIA ROSAS (**Target Account 1**) had the following conversation:

TREMPER: Yoooo cuhhhhh we're the key to the white vet

TREMPER: Scotty said you got it from needa car cuh my mom gotta use her shit

VALENCIA-ROSAS: I do but I'm busy [right now]

VALENCIA-ROSAS: Y'all don't needa do none [right now]

VALENCIA-ROSAS: We will pick you up before we leave

TREMPER: What I got 2 boat just [right now]

TREMPER: Yo ass finna tell me I got nun to do [laughing emoji inserted]

TREMPER: I got motion boyyyyyy

78. Based on my training and experience, this conversation indicated TREMPER had two "boats" of fentanyl pills to sell and was asking VALENCIA ROSAS for a car to drive. A "boat" is a common drug slang term for 1,000 fentanyl pills. "Motion" is a common street slang term for "business," i.e., drug trafficking.

79. TREMPER used **Target Account 8** to communicate with other individuals for drug trafficking purposes as well. For example, on October 1, 2023, the unidentified user of Instagram account "luvbluu._" (account number 15857431469) initiated a conversation with TREMPER via Instagram Messenger regarding suspected drug sales. The conversation was as follows:

Luvbluu._: hey love pablojr told me you sell blues, could you bring me some ?"

TREMPER: How much

Luvbluu._: how much are they a pop?

TREMPER : 45cents

1 Luvbluu._: Liked a message

2 Luvbluu._: are you in [Tacoma]?

3 Luvbluu._: they said they wanna spend 20

4 Luvbluu._: how many is that

5 TREMPER: 9

6 Luvbluu._: wait 45 cents if you're spending a certain amount like over
7 50?

8 TREMPER: Nah 45 is my price

9 TREMPER: Don't matter how much you spend

10 Luvbluu._: so if I wanted to spend like \$150 how much would that get
11 me

12 Luvbluu._: oh okok

13 Luvbluu._: ?

14 TREMPER: 68

15 Luvbluu._: Liked a message

16 Luvbluu._: set you available right now?

17 Luvbluu._: n are u in [Tacoma]

18 Luvbluu._: ??

19 TREMPER: Yeahhh I'm bouts go re up [right now] just ran out

20 Luvbluu._: wait you in [Tacoma] bub

21 TREMPER – Yeahh

22 Luvbluu._: good I just have it when ppl are far

23 Luvbluu._: but do u have weed toooo

24 TREMPER – Nahhg I got yowderw [sic]

25 Luvbluu._: ok bub then umm how long will it take you to grab it ?

26 TREMPER – I'll [let you know] In like 30 min
27

80. Based on the context of this conversation, I believe TREMPER was planning to sell fentanyl pills to Luvbluu._ at \$.45 per pill after TREMPER got more pills (“I’m bouts to go re up”). I do not know whether this transaction occurred as planned since TREMPER indicated he would tell Luvbluu._ in 30 minutes whether he got more pills. I believe TREMPER also indicated he did not have any marijuana available but had cocaine (“powder”).

81. Based on the above, I believe TREMPER used **Target Account 8** in furtherance of drug trafficking activities for the VALENCIA ROSAS DTO. TREMPER was released from custody on a pretrial appearance bond in December 2023, so it is possible he has resumed use of **Target Account 8**.

BACKGROUND INFORMATION ABOUT INSTAGRAM

82. Instagram is a service owned by Meta, a United States company and a provider of an electronic communications service as defined by 18 U.S.C. §§ 3127(1) and 2510. Specifically, Instagram is a free-access social networking service, accessible through its website and its mobile application, that allows subscribers to acquire and use Instagram accounts through which users can share messages, multimedia, and other information with other Instagram users and the public.

83. Meta collects basic contact and personal identifying information from users during the Instagram registration process. This information, which can later be changed by the user, may include the user’s full name, birth date, gender, contact e-mail addresses, physical address (including city, state, and zip code), telephone numbers, credit card or bank account number, and other personal identifiers. Meta keeps records of changes made to this information.

84. Meta also collects and retains information about how each user accesses and uses Instagram. This includes information about the Internet Protocol (“IP”) addresses used to create and use an account, unique identifiers and other information

1 about devices and web browsers used to access an account, and session times and
2 durations.

3 85. Each Instagram account is identified by a unique username chosen by the
4 user. Users can change their usernames whenever they choose but no two users can have
5 the same usernames at the same time. Instagram users can create multiple accounts and, if
6 “added” to the primary account, can switch between the associated accounts on a device
7 without having to repeatedly log-in and log-out.

8 86. Instagram users can also connect their Instagram and Facebook accounts to
9 utilize certain cross-platform features, and multiple Instagram accounts can be connected
10 to a single Facebook account. Instagram accounts can also be connected to certain third-
11 party websites and mobile apps for similar functionality. For example, an Instagram user
12 can “tweet” an image uploaded to Instagram to a connected Twitter account or post it to a
13 connected Facebook account or transfer an image from Instagram to a connected image
14 printing service. Meta maintains records of changed Instagram usernames, associated
15 Instagram accounts, and previous and current connections with accounts on Meta and
16 third-party websites and mobile apps.

17 87. Instagram users can “follow” other users to receive updates about their
18 posts and to gain access that might otherwise be restricted by privacy settings (for
19 example, users can choose whether their posts are visible to anyone or only to their
20 followers). Users can also “block” other users from viewing their posts and searching for
21 their account, “mute” users to avoid seeing their posts, and “restrict” users to hide certain
22 activity and prescreen their comments. Instagram also allows users to create a “close
23 friends list” for targeting certain communications and activities to a subset of followers.

24 88. Users have several ways to search for friends and associates to follow on
25 Instagram, such as by allowing Meta to access the contact lists on their devices to identify
26 which contacts are Instagram users. Meta retains this contact data unless deleted by the
27 user and periodically syncs with the user’s devices to capture changes and additions.

1 Users can similarly allow Meta to search an associated Facebook account for friends who
2 are also Instagram users. Users can also manually search for friends or associates.

3 89. Each Instagram user has a profile page where certain content they create
4 and share (“posts”) can be viewed either by the public or only the user’s followers,
5 depending on privacy settings. Users can customize their profile by adding their name, a
6 photo, a short biography (“Bio”), and a website address.

7 90. One of Instagram’s primary features is the ability to create, edit, share, and
8 interact with photos and short videos. Users can upload photos or videos taken with or
9 stored on their devices, to which they can apply filters and other visual effects, add a
10 caption, enter the usernames of other users (“tag”), or add a location. These appear as
11 posts on the user’s profile. Users can remove posts from their profiles by deleting or
12 archiving them. Archived posts can be reposted because, unlike deleted posts, they
13 remain on Meta’s servers.

14 91. Users can interact with posts by liking them, adding or replying to
15 comments, or sharing them within or outside of Instagram. Users receive notification
16 when they are tagged in a post by its creator or mentioned in a comment (users can
17 “mention” others by adding their username to a comment followed by “@”). An
18 Instagram post created by one user may appear on the profiles or feeds of other users
19 depending on a number of factors, including privacy settings and which users were
20 tagged or mentioned.

21 92. An Instagram “story” is similar to a post but can be viewed by other users
22 for only 24 hours. Stories are automatically saved to the creator’s “Stories Archive” and
23 remain on Meta’s servers unless manually deleted. The usernames of those who viewed a
24 story are visible to the story’s creator until 48 hours after the story was posted.

25 93. Instagram allows users to broadcast live video from their profiles. Viewers
26 can like and add comments to the video while it is live, but the video and any user
27

1 interactions are removed from Instagram upon completion unless the creator chooses to
2 send the video to IGTV, Instagram's long-form video app.

3 94. Instagram Direct, Instagram's messaging service, allows users to send
4 private messages to select individuals or groups. These messages may include text,
5 photos, videos, posts, videos, profiles, and other information. Participants to a group
6 conversation can name the group and send invitations to others to join. Instagram users
7 can send individual or group messages with "disappearing" photos or videos that can
8 only be viewed by recipients once or twice, depending on settings. Senders can't view
9 their disappearing messages after they are sent but do have access to each message's
10 status, which indicates whether it was delivered, opened, or replayed, and if the recipient
11 took a screenshot. Instagram Direct also enables users to video chat with each other
12 directly or in groups.

13 95. Instagram offers services such as Instagram Checkout and Facebook Pay
14 for users to make purchases, donate money, and conduct other financial transactions
15 within the Instagram platform as well as on Facebook and other associated websites and
16 apps. Instagram collects and retains payment information, billing records, and
17 transactional and other information when these services are utilized.

18 96. Instagram has a search function which allows users to search for accounts
19 by username, user activity by location, and user activity by hashtag. Hashtags, which are
20 topical words or phrases preceded by a hash sign (#), can be added to posts to make them
21 more easily searchable and can be "followed" to generate related updates from Instagram.
22 Meta retains records of a user's search history and followed hashtags.

23 97. Meta collects and retains location information relating to the use of an
24 Instagram account, including user-entered location tags and location information used by
25 Meta to personalize and target advertisements.

26 98. Meta uses information it gathers from its platforms and other sources about
27 the demographics, interests, actions, and connections of its users to select and personalize

1 ads, offers, and other sponsored content. Meta maintains related records for Instagram
2 users, including information about their perceived ad topic preferences, interactions with
3 ads, and advertising identifiers. This data can provide insights into a user's identity and
4 activities, and it can also reveal potential sources of additional evidence.

5 99. In some cases, Instagram users may communicate directly with Meta about
6 issues relating to their accounts, such as technical problems, billing inquiries, or
7 complaints from other users. Social networking providers like Meta typically retain
8 records about such communications, including records of contacts between the user and
9 the provider's support services, as well as records of any actions taken by the provider or
10 user as a result of the communications.

11 100. For each Instagram user, Meta collects and retains the content and other
12 records described above, sometimes even after it is changed by the user (including
13 usernames, phone numbers, email addresses, full names, privacy settings, email
14 addresses, and profile bios and links).

15 **INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

16 101. In this investigation, Joel Adrian VALENCIA ROSAS, Scott BURROWS,
17 Jesus Emmanuel CARDENAS GONZALES, Silias HALE, Ronnie KENDRICK, Cristian
18 MERCADO, Alyson PYLES, and KeShaun TREMPER have used the **Target Instagram**
19 **Accounts** to communicate about the DTO's drug trafficking activities. In my training and
20 experience, evidence of who was using Instagram and from where, and evidence related
21 to criminal activity of the kind described above, may be found in the files and records
22 described above. This evidence may establish the "who, what, why, when, where, and
23 how" of the criminal conduct under investigation, thus enabling the United States to
24 establish and prove each element or, alternatively, to exclude the innocent from further
25 suspicion. The stored communications and files connected to an Instagram account also
26 may provide direct evidence of the offenses under investigation. Based on my training
27 and experience, instant messages, photos, and videos are often created and used in

1 furtherance of criminal activity, including to communicate and facilitate the offenses
2 under investigation. In addition, the user's account activity, logs, stored electronic
3 communications, and other data retained by Meta can indicate who has used or controlled
4 the account. This "user attribution" evidence is analogous to the search for "indicia of
5 occupancy" while executing a search warrant at a residence.

6 102. Other information connected to the use of Instagram may lead to the
7 discovery of additional evidence. For example, the **Target Instagram Accounts** may
8 reveal other communication services used in furtherance of the crimes under
9 investigation or services used to move money between co-conspirators. In addition,
10 information contained in the **Target Instagram Accounts** can lead to the identification
11 of additional co-conspirators.

12 CONCLUSION

13 103. Pursuant to Title 18, United States Code, Section 2703(g), this application
14 and affidavit for a search warrant seeks authorization to permit Meta, and its agents and
15 employees, to assist agents in the execution of this warrant. Once issued, the search
16 warrant will be presented to Meta with direction that it identify the **Target Instagram**
17 **Accounts** described in Attachment A to this affidavit, as well as other subscriber and log
18 records associated with the accounts, as set forth in Section I of Attachment B to this
19 affidavit. The presence of a law enforcement officer is not required for the service or
20 execution of this warrant. The government will execute this warrant by serving the
21 warrant on Meta. Because the warrant will be served on Meta, who will then compile the
22 requested records at a time convenient to it, reasonable cause exists to permit the
23 execution of the requested warrant at any time in the day or night.

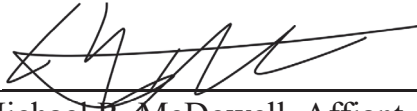
24 104. The search warrant will direct Meta to create an exact copy of the specified
25 account and records.
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106. Based on my experience and training, and the experience and training of other agents with whom I have communicated, it is necessary to review and seize a variety of communications that identify any users of the **Target Instagram Accounts** and communications sent or received in temporal proximity to incriminating communications that provide context to the incriminating communications.

107. Based on the forgoing, I request that the Court issue the proposed search warrant. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that - has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i). Accordingly, by this Affidavit and Warrant, I seek authority for the government to search all the items specified in Section I, Attachment B (attached hereto and incorporated by reference herein) to the Warrant, and specifically to seize all of the data, documents and records that are identified in Section II to that same Attachment.

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1 108. This affidavit and application are being presented by reliable electronic
2 means pursuant to Federal Rules of Criminal Procedure 4.1 and 41(d)(3).
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5 _____
6 Michael R. McDowell, Affiant
7 Special Agent
8 Drug Enforcement Administration

9 The above-named agent provided a sworn statement to the truth of the foregoing
10 affidavit by telephone on the 20th day of February 2024.
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13 _____
14 DAVID W. CHRISTEL
15 United States Magistrate Judge
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ATTACHMENT A**Accounts to be Searched**

This warrant applies to information associated with the following eight Instagram accounts (collectively, the **Target Instagram Accounts**) that is stored at premises owned, maintained, controlled, or operated by Meta Platforms, Inc., a company headquartered at 1 Meta Way, Menlo Park, CA 94025:

- a. Account Identifier 23153502019, an Instagram account believed to be used by Joel Adrian VALENCIA ROSAS (**Target Account 1**);
- b. Account Identifier 60082923383, an Instagram account believed to be used by Scott BURROWS (**Target Account 2**);
- c. Account Identifier 13801971207, an Instagram account believed to be used by Jesus Emmanuel CARDENAS GONZALEZ (**Target Account 3**);
- d. Account Identifier 26498653651, an Instagram account believed to be used by Silias HALE (**Target Account 4**);
- e. Account Identifier 1698269366, an Instagram Account believed to be used by Ronnie KENDRICK (**Target Account 5**);
- f. Account Identifier 2946923016, an Instagram Account believed to be used by Cristian MERCADO (**Target Account 6**);
- g. Account Identifier 5600171309, an Instagram Account believed to be used by Alyson PYLES (**Target Account 7**); and
- h. Account Identifier 61387315052, an Instagram account believed to be used by KeShaun TREMPER (**Target Account 8**).

The contents of these accounts were subject to a preservation request logged under case number 8286368 on December 5, 2023.

ATTACHMENT B

I. Section I - Information to be disclosed by Meta Platforms, Inc. (“Meta”) for search:

To the extent that the information described in Attachment A is within the possession, custody, or control of Meta, regardless of whether such information is located within or outside of the United States, and including any emails, records, files, logs, or information that has been deleted but is still available to Meta, Meta is required to disclose the following information to the government for the **Target Instagram Accounts** listed in Attachment A:

- A. All business records and subscriber information, in any form kept, pertaining to the **Target Instagram Accounts**, including:
 1. Identity and contact information (past and current), including full name, e-mail addresses, physical address, date of birth, phone numbers, gender, hometown, occupation, websites, and other personal identifiers;
 2. All Instagram usernames (past and current) and the date and time each username was active, all associated Instagram and Facebook accounts (including those linked by machine cookie), and all records or other information about connections with Facebook, third-party websites, and mobile apps (whether active, expired, or removed);
 3. Length of service (including start date), types of services utilized, purchases, and means and sources of payment (including any credit card or bank account number) and billing records;
 4. Devices used to login to or access the **Target Instagram Accounts**, including all device identifiers, attributes, user agent strings, and information about networks and connections, cookies, operating systems, and apps and web browsers;
 5. Internet Protocol (“IP”) addresses used to create, login, and use the accounts, including associated dates, times, and port numbers, from September 7, 2023, to present for all eight **Target Instagram Accounts**;
 6. Privacy and account settings, including change history; and

7. Communications between Meta and any person regarding the **Target Instagram Accounts**, including contacts with support services and records of actions taken.

B. All content (whether created, uploaded, or shared by or with the **Target Instagram Accounts**), records, and other information relating to videos (including live videos and videos on IGTV), images, stories and archived stories, past and current bios and profiles, posts and archived posts, captions, tags, nametags, comments, mentions, likes, follows, followed hashtags, shares, invitations, and all associated logs and metadata, for the following date ranges:

1. For **Target Account 1** (Account Identifier 23153502019) and **Target Account 2** (Account Identifier 60082923383), from September 7, 2023, to present;

2. For Target Account 3 (Account Identifier 13801971207) from September 12, 2023, to present; and

3. For **Target Account 4** (Account Identifier 26498653651), **Target Account 5** (Account Identifier 1698269366), **Target Account 6** (Account Identifier 2946923016), **Target Account 7** (Account Identifier 5600171309), and **Target Account 8** (Account Identifier 61387315052), from October 13, 2023, to present;

C. All content, records, and other information relating to communications sent from or received by the **Target Instagram Accounts** for the date ranges identified in Subparagraph B, above, including but not limited to:

1. The content of all communications sent from or received by the **Target Instagram Accounts**, including direct and group messages, and all associated multimedia and metadata, including deleted and draft content if available;

2. All records and other information about direct, group, and disappearing messages sent from or received by the **Target Instagram Accounts**, including dates and times, methods, sources and destinations (including usernames and account numbers), and status (such as delivered, opened, replayed, screenshot);

3. All records and other information about group conversations and video chats, including dates and times, durations, invitations, and participants (including usernames, account numbers, and date and time of entry and exit); and

4. All associated logs and metadata;
- D. All content, records, and other information relating to all other interactions between the **Target Instagram Accounts** and other Instagram users for the date ranges identified in Subparagraph B, above, including but not limited to:
 1. Interactions by other Instagram users with the **Target Instagram Accounts** or their content, including posts, comments, likes, tags, follows (including unfollows, approved and denied follow requests, and blocks and unblocks), shares, invitations, and mentions;
 2. All users the **Target Instagram Accounts** have followed (including the close friends list), unfollowed, blocked, unblocked, muted, restricted, or denied a request to follow, and of users who have followed, unfollowed, blocked, unblocked, muted, restricted, or denied a request to follow the **Target Instagram Accounts**;
 3. All contacts and related sync information; and
 4. All associated logs and metadata;
- E. All records of searches performed by the **Target Instagram Accounts** for the date ranges identified in Subparagraph B, above, to present; and
- F. All location information, including location history, login activity, information geotags, and related metadata for the date ranges identified in Subparagraph B, above, to present.

Meta is hereby ordered to disclose the above information to the government within 14 days of issuance of this warrant.

II. Section II - Information to be seized by the government

All information described above in Section I that constitutes evidence of violations of 21 U.S.C. §§ 841(a)(1) and 846 (drug trafficking, conspiracy) and 18 U.S.C. § 1956 (money laundering), those violations involving Joel Adrian VALENCIA ROSAS, Scott BURROWS, Jesus Emmanuel CARDENAS GONZALES, Silias HALE, Ronnie KENDRICK, Cristian MERCADO, Alyson PYLES, and KeShaun TREMPER, and

1 occurring after September 7, 2023, including, for the **Target Instagram Accounts**
2 described in Attachment A, information pertaining to the following matters:

- 3 (a) The distribution of illegal drugs, conspiracy to distribute controlled
4 substances, the laundering of drug proceeds, and the possession of firearms
5 in furtherance of drug trafficking activities;
- 6 (b) Evidence indicating how and when the account was accessed or used, to
7 determine the geographic and chronological context of account access, use,
8 and events relating to the crime under investigation and to the account
9 owner;
- 10 (c) Evidence indicating the account owner's state of mind as it relates to the
11 crimes under investigation;
- 12 (d) The identity of the person(s) who created or used the user ID, including
13 records that help reveal the whereabouts of such person(s); and
- 14 (e) The identity of person(s) who communicated with the user ID about the
15 sale, purchase, or distribution of controlled substances and/or related
16 money laundering offenses and/or related firearms offenses, including
17 records that help reveal their whereabouts.
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